

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	WT Docket No. 06-150
Service Rules for the 698-746, 747-792)	
and 777-792 MHz Bands)	
)	
Revision of the Commission's Rules to Ensure)	CC Docket No. 94-102
Compatibility with Enhanced 911 Emergency)	
Calling Systems)	
)	
Sections 68.4(a) of the Commission's Rules)	WT Docket No. 01-309
Governing Hearing Aid-Compatible Telephones)	

To: The Commission

REPLY COMMENTS OF CORR WIRELESS COMMUNICATIONS, LLC

Corr Wireless Communications, LLC ("Corr") hereby submits these reply comments with regard to the matters raised in the initial comment cycle. The initial comments followed a somewhat predictable pattern, with the large national carriers urging retention of the status quo on the proposed 700 MHz band plan and smaller carriers arguing for EA- or CMA- based geographic territories. One salient fact stands out regarding the current band plan of exclusively EAG-sized territories. EAG or even REAG-sized territories are well beyond the capability of any carrier but a national based carrier (or its equivalent)¹ to buy. Not only would the tens of

¹ In the AWS Auction 66, a consortium of giant cable TV companies participated along with a national carrier.

millions of dollars necessary to purchase the rights to a wide swath of the United States be

beyond the financial wherewithal of any local carrier, but there would be large sections of the EAGs which could not be tied to the markets that the smaller carriers presently serve or wish to expand into. The pieces are just too big. By retaining the EAG format exclusively, the Commission would realistically cut some 90% of the potential bidding business population out of contention, leaving the majors to divide up the spoils among their tiny club without the prospect of any serious competition. (This is perhaps why the EAGs in Auction 66 went for lower prices per pop than the smaller markets – there were fewer potential bidders.) It is no wonder, then, that the majors are strongly favoring the EAG approach: they would get vast areas of the country at a lower price and with less competition than if more viable bidders were able to participate.

Most of the commenting smaller or regional carriers proposed or supported breaking the geographic licenses into smaller territories which could be purchased by them in sizes and blocks which could be tailored to the specific needs of their companies and communities. Because there was a certain commonality of vision in the various comments, a number of interested carriers convened during the reply period to see if a consensus plan acceptable to all of them could be arrived at. By a process of collaboration and discussion, the convening parties have arrived at a sensible plan which seems, on balance, to meet the needs of small, regional and national carriers. The plan calls for breaking the available spectrum into six blocks, with two REAG licenses available for those entities desiring wide-area coverage,

two EA licenses for those desiring regional coverage, and two CMA licenses for those who either want local coverage only or want to construct a coverage area from manageable building blocks. The plan also attempts to preserve the Commission's existing spectrum blocks, except to divide the present 20 MHz Upper Band D block into two 10 MHz blocks. Details of the consensus plan are being filed in the record here. This division of the blocks seems to meet the needs of all potential parties equitably without favoring or disadvantaging any one. Corr therefore subscribes to the consensus plan as the best way to accommodate all conflicting needs.

Corr wishes to stress one last feature of the revised band plan. It is particularly important that one of the CMA blocks be the Lower Band B block. That block is adjacent to the already auctioned CMA-sized C block, which many smaller carriers acquired in the first 700 MHz auction. In order to achieve the desired building block effect from a spectrum standpoint as well as a territorial standpoint, it is essential that the adjacent block be available to be integrated into planned 700 MHz applications.

Respectfully submitted,

Corr Wireless Communications, LLC

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